

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

CAROLYN WALKER,

Plaintiff,

vs.

DOLLAR TREE STORES, INC.,

Defendant.

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Case No. _____

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PETITION

COMES NOW the Plaintiff, Carolyn Walker, and for her cause of action against Defendant, Dollar Tree Stores, Inc., a foreign for-profit business corporation ("Dollar Tree"), alleges and states as follows:

1. Plaintiff is a resident of Oklahoma City, Oklahoma County, State of Oklahoma.
2. At all times relevant herein, upon information and belief, Defendant was, and still is, a foreign for-profit business corporation organized under the laws of the State of Virginia with a place of business in Oklahoma County, State of Oklahoma.
3. The accident which is the subject of this litigation occurred in Oklahoma County, State of Oklahoma.
4. Venue is proper in Oklahoma County, State of Oklahoma, and the Court has jurisdiction over the parties.
5. On or about February 11, 2021, Plaintiff visited a Dollar Tree store located at 1432 W. Britton Road in Oklahoma City, Oklahoma County, Oklahoma.
6. Defendant failed to make its premises safe for its invited guests by allowing its employees to stack baskets directly in front of the entrance to the store, creating a hazardous situation.

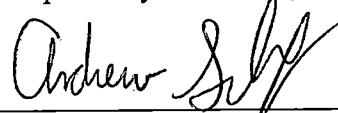
7. As Plaintiff entered the store, she tripped over the baskets and fell, sustaining multiple injuries.

8. As a direct and proximate result of Defendant's actions, Plaintiff has suffered, and will continue to suffer, damages which include, but are not limited to, the following:

- a. Physical pain and suffering, past and future;
- b. Mental pain and suffering, past and future;
- c. Permanent injuries;
- d. Physical impairment;
- e. Reasonable expenses of necessary medical care, treatment and services, past and future; and
- f. Any other damages to be set forth after discovery; all of which exceed the amount required for diversity jurisdiction pursuant to 28 U.S.C. §1332.

WHEREFORE, Plaintiff prays for judgment against the Defendant as set forth above, including costs, attorney's fees and interest, and other such relief the Court deems just and proper.

Respectfully submitted,



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